

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SOUTHBRIDGE COMPANIA DE SEGUROS
GENERALES S.A., as subrogee of
AQUACHILE, INC.,

Plaintiff,

v.

JB HUNT TRANSPORT SERVICES and
JOHN DOE COMPANY, named as a
pseudonym for a JB HUNT enterprise,

Defendants.

JB HUNT TRANSPORT SERVICES

Third-Party Plaintiff,

v.

ANDOBA TRUCKING, INC.

Third-Party Defendant.

Case No.: 2:22-cv-00105-JCC-DWC

STIPULATION AND ORDER EXTENDING
TIME FOR THIRD-PARTY DEFENDANT
ANDOBA TRUCKING, INC. TO FILE ITS
RESPONSE TO THE THIRD-PARTY
COMPLAINT

STIPULATION

Pursuant to Fed. R. Civ. P. 12(a) and Local Rules W.D. Wash. LCR 7(d)(1), the parties,
by and their counsel of record, hereby stipulate to entry of the proposed Order set forth below,

STIPULATION AND ORDER EXTENDING TIME FOR THIRD-PARTY
DEFENDANT ANDOBA TRUCKING, INC. TO FILE ITS RESPONSE
TO THE THIRD-PARTY COMPLAINT - 1

BAILEY DUQUETTE
500 UNION STREET, SUITE 800
SEATTLE, WASHINGTON 98101
T 206.225.2250 | F 888.233.5869

1 granting Third-Party Defendant Andoba Trucking, Inc. (“Andoba”) an extension until **August 10,**
2 **2022**, to file its response to the Third-Party Complaint. In support of this request, the parties
3 submit as follows:

4 1. The original complaint in this matter was filed against JB Hunt Transport Services
5 (“JB Hunt”) on January 31, 2022. Dkt. #1. On March 9, 2022, JB Hunt filed its answer to the
6 complaint. Dkt. #5.

7 2. On May 6, 2022, the Court issued an Order Setting Trial Date and Pretrial
8 Schedule, which provided a deadline for joining additional parties of July 1, 2022. Dkt. #12.

9 3. On June 30, 2022, JB Hunt filed a Stipulated Motion for Leave to File Third-Party
10 Complaint against Andoba, which the Court granted on July 13, 2022. Dkt. #15, 22.

11 4. On July 5, 2022, JB Hunt filed its Third-Party Complaint against Andoba (Dkt.
12 #18), and thereafter, on or about July 6, 2022, served Andoba with the Third-Party Complaint.
13 Based on the service date, Andoba’s answer deadline would fall on July 27, 2022.

14 5. On July 25, 2022, the undersigned counsel from the Bailey Duquette P.C. law firm
15 contacted counsel for Plaintiff and Defendant/Third-Party Plaintiff (a) indicating that they would
16 be appearing on behalf of Andoba and (b) requesting an extension until August 10, 2022, to file
17 a responsive pleading. Specifically, the proposed August 10, 2022 deadline constitutes a two-
18 week extension from the current July 27, 2022 deadline based on the service date.

19 6. Plaintiff and Defendant/Third-Party Plaintiff have indicated that they do not
20 oppose the proposed extension.

21 7. Based on the foregoing, Andoba respectfully requests that the Court grant it until
22 **August 10, 2022**, to file its responsive pleading to the Third-Party Complaint.

ORDER

IT IS SO ORDERED. Third-Party Defendant Andoba Trucking, Inc. shall file and serve its response to the Third-Party Complaint by or before August 10, 2022.

DATED this 27th day of July, 2022.



David W. Christel
United States Magistrate Judge

Respectfully Submitted:

BAILEY DUQUETTE P.C.
Counsel for Third-Party Defendant Andoba Trucking, Inc.

By: /s/ Hozaiifa Y. Cassubhai
Hozaiifa Y. Cassubhai, WSBA #39512
William R. Burnside, WSBA #36002
500 Union Street, Suite 800
Seattle, Washington 98101
Telephone: (206) 225-2250
Fax: (866) 233-5869
Email: hozaifa@baileyduquette.com
will@baileyduquette.com

Approved as to Form:

THE CHARTWELL LAW OFFICES, LLP
Counsel for Defendant/Third-Party Plaintiff
J.B. Hunt Transport Services

By: /s/ Kelsey A. Terry
David P. Rossmiller, WSBA #36491
Kelsey A. Terry, WSBA #52417
1050 SW 6th Avenue, Suite 1100
Portland, Oregon 97204
Telephone: (503) 886-8108
Fax: (503) 961-7864
Email: drossmiller@chartwelllaw.com
kterry@chartwelllaw.com

NICOLL BLACK & FEIG, PLLC
Counsel for Plaintiff Southbridge
Compania de Seguros Generales S.A. as
subrogee of Aquachile, Inc.

By: /s/ Rodney Q. Fonda
Rodney Q. Fonda, WSBA #6594
1325 Fourth Avenue, Suite 1650
Seattle, Washington 98101
Telephone: (206) 838-7555
Fax: (206) 838-7515
Email: rfonda@nicollblack.com

STIPULATION AND ORDER EXTENDING TIME FOR THIRD-PARTY
DEFENDANT ANDOBA TRUCKING, INC. TO FILE ITS RESPONSE
TO THE THIRD-PARTY COMPLAINT - 3

BAILEY DUQUETTE
500 UNION STREET, SUITE 800
SEATTLE, WASHINGTON 98101
T 206.225.2250 | F 888.233.5869